Applicant: Renato Conta et al.

Appl. No.: 10/577,431

REMARKS

Applicant thanks the Examiner for the careful consideration of this application. Claims

1-21 and 23-27 are currently pending. Claims 1, 20, and 26 have been amended. Based on the

foregoing amendments and the following remarks, the Applicant respectfully requests that the

Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Objections to the Claims

The Office Action objected to claim 26 for depending from cancelled claim 22. Claim 26

has been amended to depend from claim 25. Accordingly, the Applicant requests that this

objection be withdrawn.

Rejections under 35 U.S.C. § 103

(1) The Office Action rejected claims 1, 3-7, 11-21, and 23-27 under 35 U.S.C. § 103(a)

as being obvious U.S. Patent No. 6,554,408 to Miki et al. ("Miki") in view of U.S. Patent No.

6,412,921 to Manini ("Manini"). The Office Action further rejected claims 2, 9, and 10 under 35

U.S.C. § 103(a) as being obvious over Miki in view of Manini. Claims 1 and 20 are the

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independent claims. The Applicant respectfully traverses this rejection for the following reasons.

First, no reasonable combination of Miki and Manini discloses or renders obvious "a

plurality of ribs located in the main distribution channel between one or more delivery channels, the ribs

extending transversely across the main distribution channel to form a further distribution channel

orthogonal to the main distribution channel," as recited by claim 1.

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The Office Action aligns Miki's ink inlet 16 or 65, shown in FIGS. 1 and 12, respectively, with the previously recited "distribution channel" (now recited as the "main distribution channel"). The Office Action also aligns Miki's ink channels 13 or 63, shown in FIGS. 1 and 12, respectively, with the claimed "delivery channels." Further, the Office Action apparently aligns the material located between adjacent ink channels 13 or 63 with the claimed "ribs." However, the alleged "ribs" do not form a "further distribution channel orthogonal to" the ink inlet 16 or 65, as claimed. Rather, as best seen in Miki's FIG. 12, the alleged "ribs" merely define the ink channels 63, that is, they separate one ink channel 63 from the adjacent ink channel 63. Manini does not provide the missing disclosure or suggestion.

In view of the foregoing, no reasonable combination of Miki and Manini discloses or renders obvious "a plurality of ribs located in the main distribution channel between one or more delivery channels, the ribs extending transversely across the main distribution channel to form a further distribution channel orthogonal to the main distribution channel," as recited by claim 1.

Second, no reasonable combination of Miki and Manini discloses or renders obvious, "ejection nozzles are made parallel and adjacent to the front of the module," as recited by claim 1. Claim 1 defines the front of the module as being aligned along the main distribution channel, which the Office Action aligns with the ink inlets 16 or 65 of Miki's FIGS. 1 and 12. The Office Action aligns the ink outlets 14 of Miki's FIG. 1 with the claimed "ejection nozzles." However, the ink outlets 14 are not "made parallel and adjacent to the front of the module" (e.g., the same side of the module as the ink inlets 16 or 65).

Rather, as shown in Miki's FIG. 1, the ink outlets 14 are located on the opposite side of the substrate 18 from the ink inlet 16. Manini does not remedy the deficiencies of Miki. Therefore, no reasonable

combination of Miki and Manini discloses or renders obvious "ejection nozzles are made parallel and adjacent to the front of the module," as recited by claim 1.

The Applicant submits that claim 1 is patentable over Miki in view of Manini for at least the foregoing reasons. Claim 20 has been amended in an analogous manner to claim 1, and is patentable over Miki and Manini for at least the same reasons. Claims 2-7, 9-19, 21, and 23-27 depend variously from claims 1 and 20, and are patentable for at least the same reasons.

- (2) The Office Action rejected claim 8 under 35 U.S.C. § 103(a) as being obvious over Miki and Manini in view of U.S. Patent No. 4,879,568 to Bartky et al. ("Bartky"). Claim 8 depends indirectly from claim 1, which as demonstrated above, is patentable over Miki in view of Manini. Bartky does not remedy the deficiencies of Miki and Manini. Accordingly, the Applicant submits that claim 1, and its dependent claim 8, are patentable over any reasonable combination of Miki, Manini, and Bartky.
- (3) The Office Action rejected claims 20, 21, and 23-27 under 35 U.S.C. § 103(a) as being obvious over Miki in view Manini, and further in view of U.S. Patent No. 6,347,861 to Tom et al. ("Tom"). Claim 20 is the independent claim. As demonstrated above, claim 20 is patentable over Miki in view of Manini. Tom does not remedy the deficiencies of Miki and Manini. Accordingly, claim 20, and its dependent claims 21 and 23-27, are patentable over any reasonable combination of Miki, Manini, and Tom.

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## Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant, therefore, respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the

Prompt and favorable consideration of this Amendment is respectfully requested.

Examiner is hereby invited to telephone the undersigned at the number provided.

Respectfully submitted,

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